

Subject: Winoa's duties regarding CLP regulation

Product: Stelux® abrasive

The Classification, Labelling and Packaging (CLP) Regulation ((EC) No 1272/2008) is based on the United Nations' Globally Harmonised System (GHS) and its purpose is to ensure a high level of protection of health and the environment, as well as the free movement of substances, mixtures and articles.

The CLP Regulation amended the Dangerous Substances Directive (67/548/EEC (DSD)), the Dangerous Preparations Directive (1999/45/EC (DPD)) and Regulation (EC) No 1907/2006 (REACH) Since 1 June 2015, CLP is the only legislation in force in the EU for classification and labelling of substances and mixtures.

In accordance with REACH and CLP regulation, products manufactured by Winoa are considered to be mixtures.

All intentionally added alloying elements with the exception of nickel are not classified as hazardous. Nickel is the only substance of major importance with regard to the hazard classification of Stelux® C and Stelux® CN products. In accordance with (EC) Regulations 1272/2008 (CLP) and 790/2009 (ATP 1), nickel is classified as a Carcinogen Category 2, Specific Target Organ Toxicity Repeated Exposure 1 (STOT RE1) and Skin Sensitizer 1.

According to CLP regulation, an alloy can be classified either on the basis of its constituent's classification or on the hazard properties of the mixture if the mixture has been tested as such.

According to Annex I of the CLP regulation that provides specific rules for the classification of mixtures based on the classification of the individual substances in the mixture, Winoa products containing more than 1% w/w of Ni would be classified as dangerous.

However, available stainless-steel specific data provide enough evidence to show that this classification is misleading and that stainless steel is not classified as dangerous (1, 2).

Winoa is following Eurofer position and considers that Stelux® C and Stelux® CN abrasive are not classified as dangerous.

Following REACH regulation, Winoa will not systematically provide a Safety Data Sheet to its customers, but on request. SDS and exposure scenarios are available and will be communicated on request.

Reference

- (1) Eurofer Stainless Steel Position Paper, 2014
- (2) Review on toxicity of stainless steel, Finnish Institute of Occupational Health (FIOH), 2010